

# **EXHIBIT 7**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YASMINA MOHAMMED P/K/A  
SOMALIA,  
  
PLAINTIFF,

vs.

CASE NO. 1:18-CV-08469-JSR

ABEL MAKKONEN TESFAYE P/K/A  
THE WEEKND; GUILLAUME EMMANUEL  
DE HOMEM-CHRISTO AND THOMAS  
BANGALTER P/K/A DAFT PUNK;  
MARTIN MCKINNEY P/K/A DOC;  
HENRY WALTER P/K/A CIRKUT;  
JASON QUENNEVILLE P/K/A  
DAHEALA, XO RECORDS, LLC;  
REPUBLIC RECORDS; UNIVERSAL  
MUSIC GROUP; WILLIAM USCHOLD  
P/K/A WILL U; TYRONE  
DANGERFIELD P/K/A TABOO!!;  
SQUAD MUSIC GROUP; AND DOES  
1-10,

DEFENDANTS.

TELEPHONIC DEPOSITION OF

JASON QUENNEVILLE P/K/A DAHEALA

WEDNESDAY, NOVEMBER 28, 2018

REPORTED BY:  
TISHA C. OKUMA  
CSR NO. 9774

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 SOUTHERN DISTRICT OF NEW YORK</p> <p>3</p> <p>4</p> <p>5 YASMINA MOHAMMED P/K/A )</p> <p>6 SOMALIA, )</p> <p>7 PLAINTIFF, )</p> <p>8 vs. ) CASE NO. 1:18-CV-08469-JSR</p> <p>9 )</p> <p>10 ABEL MAKKONEN TESFAYE P/K/A )</p> <p>11 THE WEEKND; GUILLAUME EMMANUEL )</p> <p>12 DE HOMEM-CHRISTO AND THOMAS )</p> <p>13 BANGALTER P/K/A DAFT PUNK; )</p> <p>14 MARTIN MCKINNEY P/K/A DOC; )</p> <p>15 HENRY WALTER P/K/A CIRKUT; )</p> <p>16 JASON QUENNEVILLE P/K/A )</p> <p>17 DAHEALA, XO RECORDS, LLC; )</p> <p>18 REPUBLIC RECORDS; UNIVERSAL )</p> <p>19 MUSIC GROUP; WILLIAM USCHOLD )</p> <p>20 P/K/A WILL U; TYRONE )</p> <p>21 DANGERFIELD P/K/A TABOO!!; )</p> <p>22 SQUAD MUSIC GROUP; AND DOES )</p> <p>23 1-10, )</p> <p>24 DEFENDANTS. )</p> <p>25 _____ )</p> <p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30 TELEPHONIC DEPOSITION OF JASON QUENNEVILLE P/K/A</p> <p>31 DAHEALA, TAKEN ON BEHALF OF THE PLAINTIFF AT</p> <p>32 8383 WILSHIRE BOULEVARD, SUITE 1038, LOS ANGELES,</p> <p>33 CALIFORNIA, COMMENCING AT 6:00 P.M., WEDNESDAY,</p> <p>34 NOVEMBER 28, 2018, BEFORE TISHA C. OKUMA, CSR 9774.</p> <p>35</p>	<p>1 INDEX</p> <p>2</p> <p>3 DEPONENT: EXAMINATION BY: PAGE:</p> <p>4 Jason Quenneville Mr. Lowe 6</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9 MARKED PORTIONS:</p> <p>10 (None.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14 QUESTIONS INSTRUCTED NOT TO ANSWER:</p> <p>15 (None.)</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES OF COUNSEL:</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 LOWE &amp; ASSOCIATES, PC</p> <p>5 BY: STEVEN T. LOWE (PRO HAC VICE)</p> <p>6 8383 Wilshire Boulevard</p> <p>7 Suite 1038</p> <p>8 Beverly Hills, California 90211</p> <p>9 (310) 477-5811</p> <p>10 steven@lowelaw.com</p> <p>11</p> <p>12 APPEARANCES OF COUNSEL APPEARING TELEPHONICALLY:</p> <p>13</p> <p>14 FOR THE DEFENDANTS ABEL MAKKONEN TESFAYE P/K/A</p> <p>15 THE WEEKND, JASON QUENNEVILLE P/K/A DAHEALA, XO RECORDS,</p> <p>16 LLC, AND UNIVERSAL MUSIC GROUP:</p> <p>17 DAVIS WRIGHT TREMAINE, LLP</p> <p>18 BY: PETER ANDERSON, ATTORNEY AT LAW</p> <p>19 865 South Figueroa Street</p> <p>20 Suite 2400</p> <p>21 Los Angeles, California 90017-2566</p> <p>22 (213) 633-6800</p> <p>23 peteranderson@dwt.com</p> <p>24</p> <p>25 FOR THE DEFENDANTS GUILLAUME EMMANUEL DE HOMEM-CHRISTO</p> <p>26 AND THOMAS BANGALTER P/K/A DAFT PUNK:</p> <p>27 PROSKAUER</p> <p>28 BY: ALEX D. SILAGI, ATTORNEY AT LAW</p> <p>29 Eleven Times Square</p> <p>30 New York, NY 10036-8299</p> <p>31 (212) 969-3421</p> <p>32 asilagi@proskauer.com</p> <p>33</p> <p>34 TELEPHONICALLY ALSO PRESENT:</p> <p>35 ABEL TESFAYE, DEFENDANT</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p>	<p>1 EXHIBITS FOR IDENTIFICATION: PAGE:</p> <p>2 PLAINTIFF</p> <p>3</p> <p>4 Exhibit 18 Agreement, marked 29</p> <p>5 Confidential, Bates stamped</p> <p>6 W000118 through W000122, 5</p> <p>7 pages</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 BEVERLY HILLS, CALIFORNIA  
 2 WEDNESDAY, NOVEMBER 28, 2018, 6:00 P.M.  
 3 -OOO-

5 JASON QUENNEVILLE P/K/A DAHEALA,  
 6 having been first duly sworn, was  
 7 examined and testified as follows:

9 EXAMINATION

10 BY MR. LOWE:

11 Q. Well, good morning Mr. Quenneville. I believe  
 12 it's morning there. It's evening here.

13 Can you please state your address for the  
 14 record, please?

15 A. Yes. I don't know --

16 MR. ANDERSON: Well, his home address is care  
 17 of me. So I don't think you need his home address, do  
 18 you?

19 MR. LOWE: Well, normally, I wouldn't, Peter,  
 20 but since he's taking the position he resides in  
 21 Los Angeles, I believe for that reason I thought it  
 22 would be relevant in this case.

23 MR. ANDERSON: Well, do you want to ask him,  
 24 like, where in L.A. generally? I hate to give out a  
 25 personal -- especially for someone, like, who's a

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1 celebrity, I hate to give out a personal actual home  
 2 address.

3 Q. BY MR. LOWE: Well, how about a business  
 4 address? Can you state a business address for the  
 5 record?

6 A. Yep. One second.

7 MR. ANDERSON: While he's doing that, Steven,  
 8 Mr. Tesfaye just came into the room as well.

9 MR. LOWE: Okay.

10 MR. ANDERSON: Now it's the three of us.

11 MR. LOWE: For the record, Mr. Tesfaye just  
 12 entered the room.

13 THE WITNESS: So the address is 1880 Century  
 14 Park East, Unit 1600, Los Angeles, California 90067.

15 Q. BY MR. ANDERSON: And that is your business  
 16 address, Mr. Quenneville?

17 A. Yep.

18 Q. Okay. Do you actually have a physical office  
 19 there, or is that just a post office box?

20 A. No. I don't have a physical office there.

21 Q. Okay. All right.

22 MR. ANDERSON: Steven, can I just interrupt?  
 23 I want to say one thing.

24 MR. LOWE: Okay.

25 MR. ANDERSON: You may know this, but in the

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1 Southern District of New York, we're not allowed to  
 2 state objections the same way we do in L.A. You're  
 3 supposed to just say, "Objection as to form." You can't  
 4 talk about argumentative, lacks foundation, that kind of  
 5 stuff.

6 I just want to say that I'll, of course,  
 7 comply with that and just state "objection as to form"  
 8 if I have an objection.

9 But that's, you know, with the understanding  
 10 that the case is in the Southern District of New York,  
 11 and that's without waiving the actual grounds for the  
 12 objections, specific grounds, if it is transferred to  
 13 California.

14 MR. LOWE: Okay. Fair enough.

15 Q. BY MR. ANDERSON: Mr. Quenneville, have you  
 16 ever had your deposition taken before?

17 A. No. I have not.

18 Q. All right. Let me go through the ground rules  
 19 with you real quickly.

20 First of all, you've just been given the oath.  
 21 That's the same oath that you would be given in a court  
 22 of law, and it carries with it the same force and effect  
 23 as if you were in a court of law, including the fact  
 24 that your testimony is under penalty of perjury, and you  
 25 are required to tell the truth to the best of your

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1 ability today.

2 Do you understand that?

3 A. I understand. Yes.

4 Q. Okay. The court reporter is going to be  
 5 preparing a transcript on an expedited basis of  
 6 everything that is said today on the record. You will  
 7 have the opportunity to review that transcript and make  
 8 corrections to it.

9 However, if you make any corrections to the  
 10 transcript, I'll be able to call the Court's attention  
 11 to that. So I would ask that you give your best  
 12 testimony today, and what that essentially means is, if  
 13 you do not understand a question, or you're unable to  
 14 respond to it, that you let me know that rather than  
 15 just trying to respond.

16 Is that acceptable to you?

17 A. Understood. Yes.

18 Q. Okay. Also, the court reporter can only take  
 19 down one person speaking at a time. So I would ask that  
 20 you wait for me to finish my question, and I'll wait for  
 21 you to finish your answer, so we don't talk over each  
 22 other.

23 Okay?

24 A. Duly noted.

25 Q. All right. Also, I will be asking questions

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1 today about things that you might not have a precise  
2 recollection of, but I am entitled to your best  
3 estimate. However, we do not want you to guess.

4 Do you think you understand the difference  
5 between an estimate and a guess?

6 **A.** I absolutely do.

7 **Q.** Okay. So just to sort of clarify it, if you  
8 have some recollection of something or a faint  
9 recollection of it, I am entitled to know that. But if  
10 you just have no recollection whatsoever, then I don't  
11 want you to offer a response.

12 Are you using any medication or drugs today  
13 that would impair your ability to testify?

14 **A.** No. I have not.

15 **Q.** Okay. Terrific.

16 All right. So is it your testimony that you  
17 reside in Los Angeles, California?

18 **A.** Yes.

19 **Q.** And that's been since 2017?

20 **A.** Yes.

21 **Q.** Where did you reside before that?

22 **A.** In Canada.

23 **Q.** Okay. And what were the circumstances under  
24 which you first met Mr. Tesfaye?

25 **A.** For music.

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1 **Q.** Right.

2 **A.** I'm a music producer. It was bound to happen,  
3 with music.

4 **Q.** Right.

5 So you're a music producer, correct?

6 **A.** Yes. Correct.

7 **Q.** Okay. And can you tell me when you first met  
8 Mr. Tesfaye?

9 **A.** It was around 2013.

10 **Q.** And where did you meet?

11 **A.** In Canada.

12 **Q.** Okay. Have you and Mr. Tesfaye ever been in  
13 New York together?

14 **A.** Yes. We have.

15 **Q.** On how many occasions?

16 **A.** About -- I could not say. I don't have an  
17 exact number, and I cannot approximate. Quite a few  
18 times.

19 **Q.** Okay. Well, let's try to nail it down just a  
20 little bit.

21 "Quite a few times," would you say it's more  
22 than ten?

23 **A.** No. I would say about ten.

24 **Q.** Okay.

25 **A.** I am not 100 percent sure.

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1 **Q.** Right.

2 So approximately ten times?

3 **A.** Approximately ten.

4 **Q.** Okay. And those times that you were in

5 New York with Mr. Tesfaye, were those in connection with  
6 some business that you were doing together or pleasure  
7 or neither?

8 **A.** It was all business.

9 **Q.** Music business?

10 **A.** Yes.

11 **Q.** All right. And over what period of time did  
12 that take place? Those approximately ten times in  
13 New York with Mr. Tesfaye, what years did those take  
14 place?

15 **A.** Between 2014 until the current time, right  
16 now.

17 **Q.** Okay. Of those times that you were in  
18 New York with Mr. Tesfaye, were any of those times in  
19 connection with a live performance by Mr. Tesfaye that  
20 you either participated in or attended?

21 **A.** Yes. I've attended multiple of his shows.

22 **Q.** Right.

23 **A.** Worldwide, including New York.

24 **Q.** All right. And the ones that were in  
25 New York, do you recall where they were?

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1 **A.** There was one that was in Victoria's Secret  
2 performance with live television. Another one was  
3 Radio City Music Hall. Another one -- I can't remember.  
4 We've traveled the whole world, so I have a difficulty  
5 keeping track from the time changes.

6 **Q.** Right. Understood.

7 Well, do you recall if you were with

8 Mr. Tesfaye this past summer in New York when he did a  
9 performance?

10 **A.** Do you have a month approximately?

11 **Q.** Yeah. July of 2018.

12 **A.** No.

13 **Q.** You were not?

14 **A.** No.

15 **Q.** Okay. What about the concerts that he did in  
16 Brooklyn, New York, in 2017?

17 **A.** No. I was not there.

18 **Q.** All right.

19 **A.** To the best of my recollection.

20 **Q.** All right. So the ones that you remember are  
21 Victoria's Secret and a Radio City Music Hall  
22 performance?

23 **A.** Yes. And that was between 2014 and 2016-ish.

24 There was another one, I believe, Madison Square Garden.

25 **Q.** And do you recall when the Madison Square

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1 Garden concert was?

2 **A.** I do not.

3 **Q.** All right. Now, when you were attending, with  
4 Mr. Tesfaye, these live performances, were you actually  
5 back stage? Were you on stage? Were you in the  
6 audience?

7 **A.** I have usually an all access pass, and I move  
8 around. So I could be in the dressing room having  
9 coffee. I could be next to the stage watching his  
10 performance, or going in the audience in front of the  
11 house sound control to see how everything sounds, and  
12 then afterwards just go back to backstage. I walk  
13 around.

14 **Q.** Got it.

15 Are you compensated by The Weeknd XO, Inc., or  
16 The Weeknd XO, LLC?

17 **A.** For --

18 **Q.** I'm sorry?

19 **A.** Compensated? What was that?

20 **Q.** For your services, other than your, you know,  
21 producing or songwriting services?

22 **MR. ANDERSON:** Objection as to form.

23 Do you understand the question?

24 **THE WITNESS:** As occurred early in, like,  
25 2014, '15-ish, but afterwards things changed, and it

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1 wasn't the case anymore.

2 **Q.** BY MR. LOWE: Okay. All right. Now, do you  
3 remember any other occasions that you were in New York  
4 in 2017 or 2018 with Mr. Tesfaye, other than the ones  
5 that you just mentioned?

6 **A.** Yes.

7 **Q.** Okay. Can you tell me what they are, please?

8 **A.** The last one was in October -- from  
9 October 22nd till November -- from October 22nd, I was  
10 there for 18 days, and then I returned back to  
11 Los Angeles.

12 **Q.** Okay. October 22nd of 2018?

13 **A.** Yes.

14 **Q.** Okay.

15 **A.** Correct.

16 **Q.** And were you staying at a hotel in New York,  
17 or were you staying with Mr. Tesfaye?

18 **A.** At the hotel.

19 **Q.** And what was your purpose of being there  
20 during those 18 days?

21 **A.** To make music.

22 **Q.** Once again, business related to make music  
23 with Mr. Tesfaye?

24 **A.** Yes.

25 **Q.** Okay.

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1 **A.** Yes. Correct.

2 **Q.** And prior to that occasion when you were there  
3 for 18 days recently, do you remember when the previous  
4 time that you were in New York with Mr. Tesfaye was?

5 **A.** Yes. Vaguely. But it was also in this year.

6 **Q.** When, this year?

7 **A.** I do not know specifically, because we travel  
8 the whole world. Everything is usually, you know, find  
9 out last minute, pack my bags, go to work, type of.

10 **Q.** Well, do you know that it was prior to  
11 September of 2018?

12 **A.** Well, I was just -- I believe, yes, it was.

13 **Q.** Okay. And what were the circumstances?

14 **A.** I can look on my calendar and be a little bit  
15 more specific, but I don't recollect offhand.

16 **Q.** Okay. Do you have your calendar handy that  
17 you could look at?

18 **A.** No. Not currently.

19 **Q.** Okay. So in terms of the circumstances, do  
20 you recall how long you were in New York for?

21 **A.** I believe it must have been more than ten  
22 days.

23 **Q.** Approximately ten days?

24 **A.** Approximately. Yes.

25 **Q.** All right.

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1 **A.** Best of my recollection.

2 **Q.** Okay. And do you recall what the purpose was?

3 **A.** Same as usual. To conduct business and make  
4 music.

5 **Q.** Okay. So when you say --  
6 I'm sorry?

7 **A.** Go ahead.

8 **Q.** Would you say one way to characterize it is  
9 that to work on music together with Mr. Tesfaye?

10 **A.** Well, pretty much. Yes.

11 **Q.** Now, you mentioned a couple times that you  
12 have toured the world with him.

13 Are you basically on tour with -- well, let me  
14 restate the question.

15 There's a tour that's called the "Starboy  
16 Tour," right -- or, actually, the official name for it  
17 is "Starboy Legend of the Fall 2017 World Tour."  
18 Do you recall that tour?

19 **A.** I do. Yes.

20 **Q.** Okay. Were you on that tour with Mr. Tesfaye?

21 **A.** On the European leg of the tour.

22 **Q.** Okay. And that tour, the Legend of the Fall,  
23 the Starboy Legend of the Fall Tour, is that still going  
24 on?

25 **A.** To the best of my recollection, no.

<p style="text-align: right;">Page 18</p> <p>1 Q. When did that tour end, to your knowledge?</p> <p>2 A. I don't have the specific date; however, it</p> <p>3 has ended quite a while ago.</p> <p>4 Q. And so now there's another tour.</p> <p>5 What's the current tour called; do you know?</p> <p>6 A. There's no current tour, to the best of my</p> <p>7 knowledge.</p> <p>8 Q. Oh, okay.</p> <p>9 A. Oh, yeah. There is. There is a tour. I'm</p> <p>10 sorry. I'm completely -- okay. Currently, I don't know</p> <p>11 what the name of this tour is, because I am only</p> <p>12 familiar with the fact that there is touring.</p> <p>13 I only pay attention to whatever I'm here for.</p> <p>14 But, usually, a lot of information is conveyed to me on</p> <p>15 the day of or from another person that does work also</p> <p>16 with him. So current tour could be potentially</p> <p>17 something else. I don't know.</p> <p>18 Q. Okay.</p> <p>19 A. I'm in Hong Kong, and I'm jet lagged.</p> <p>20 Q. Okay. Well, let me ask you this.</p> <p>21 There was a tour in 2017, that was the Starboy</p> <p>22 Tour, correct?</p> <p>23 A. I believe so.</p> <p>24 Q. All right. Now, then there appear to be quite</p> <p>25 a few dates in 2018 that Mr. Tesfaye also appeared at</p>	<p style="text-align: right;">Page 20</p> <p>1 keep myself occupied with other things and continuing</p> <p>2 the music that we are working on, if any.</p> <p>3 Q. Right.</p> <p>4 So what was the one that you remember?</p> <p>5 A. The last one I remember, Toronto, because of</p> <p>6 the way -- because of the track listing and the play</p> <p>7 list of which song comes up, what time and what period</p> <p>8 of the show, and there's oftentimes where I am just not</p> <p>9 actually there to witness it.</p> <p>10 Q. I understand.</p> <p>11 MR. ANDERSON: He's specifically asking you</p> <p>12 about the last performance in New York of Starboy.</p> <p>13 THE WITNESS: Did not see it.</p> <p>14 Q. BY MR. LOWE: Well, I'm asking you what -- I'm</p> <p>15 asking you what you remember the last time -- okay.</p> <p>16 You said that you saw him perform Starboy in</p> <p>17 New York at least one time.</p> <p>18 Where was that?</p> <p>19 MR. ANDERSON: Wait a second. That's not what</p> <p>20 he testified to.</p> <p>21 But objection as to form.</p> <p>22 MR. LOWE: Okay. Well --</p> <p>23 MR. ANDERSON: He said "potentially," and</p> <p>24 that's a guess.</p> <p>25 Q. BY MR. LOWE: All right. Where do you recall</p>
<p style="text-align: right;">Page 19</p> <p>1 various, you know, locations, including Coachella in</p> <p>2 California, and, you know, Central Park in New York.</p> <p>3 That kind of thing.</p> <p>4 Is that an extension of the Starboy Tour, or</p> <p>5 is that a new tour, or do you not know?</p> <p>6 A. I have no idea.</p> <p>7 Q. Okay. All right. Fair enough.</p> <p>8 Now, during the times that you were with</p> <p>9 Mr. Tesfaye at performances in New York, did you witness</p> <p>10 him perform the song Starboy?</p> <p>11 A. Yes. I have.</p> <p>12 Q. On approximately how many occasions?</p> <p>13 A. More than ten.</p> <p>14 Q. Okay. And those were performances in</p> <p>15 New York?</p> <p>16 A. Not all ten.</p> <p>17 Q. Okay. How many --</p> <p>18 A. It's the world --</p> <p>19 Q. Okay. How many performances have you</p> <p>20 witnessed of Starboy in New York, to your best</p> <p>21 recollection?</p> <p>22 A. Potentially one.</p> <p>23 Q. Just one?</p> <p>24 A. I believe so, because I did not attend the</p> <p>25 whole show, because it was after a while; therefore, I</p>	<p style="text-align: right;">Page 21</p> <p>1 seeing Mr. Tesfaye perform Starboy in New York?</p> <p>2 A. I could not tell you.</p> <p>3 Q. Okay. You just don't recall?</p> <p>4 A. It's ongoing. Well, yeah. I don't recall.</p> <p>5 Q. All right. Now, you are a co-writer on</p> <p>6 Starboy, correct?</p> <p>7 A. Correct.</p> <p>8 Q. What did you contribute?</p> <p>9 A. It was from another idea that we had started</p> <p>10 many years ago, a few years ago.</p> <p>11 Q. Well, okay. My question is, what did you</p> <p>12 contribute to the song?</p> <p>13 MR. ANDERSON: Objection as to form.</p> <p>14 Q. BY MR. LOWE: You can attempt to answer unless</p> <p>15 you don't understand the question.</p> <p>16 A. My contribution to the song was done</p> <p>17 externally from the current final song, to a certain</p> <p>18 extent. Not fully, but it was an idea that we had</p> <p>19 started and that was elaborated on.</p> <p>20 Q. Well, let me see if I can -- that's a little</p> <p>21 vague, so let me see if I can be more specific.</p> <p>22 Did you contribute any lyrics?</p> <p>23 A. No.</p> <p>24 Q. Okay. Did you contribute any music?</p> <p>25 A. To this version, not quite, because it's a bit</p>



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1 tricky. Music is not as straightforward as an A/B  
 2 answer.  
 3 **Q.** Okay. Well --  
 4 **A.** Are you familiar with music?  
 5 **Q.** I am, actually, but that's kind of besides the  
 6 point, because, you know, I have to get on the record,  
 7 you know, what it is that you actually did in connection  
 8 with the song.  
 9 So can you --  
 10 **A.** I want to give you a proper answer, so I could  
 11 not assume or just answer anything.  
 12 **Q.** Well, do your best.  
 13 **A.** Okay. Well, like I said, we had an idea that  
 14 we had kind of tinkered around, and then that idea  
 15 eventually became part of the prechorus, and that is my  
 16 contribution.  
 17 **Q.** Ah. So you contributed some music to the  
 18 prechorus on Starboy?  
 19 **A.** Incorrect. I did not provide no music. We  
 20 started at the musical location. There's a composition  
 21 of things. It takes many forms and shapes prior to  
 22 actually becoming a final result.  
 23 And, however, that creativity is channeled  
 24 sometimes different ways; therefore, whatever we had  
 25 tinkered around with, essentially, became part of the

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1 prechorus.  
 2 **Q.** Whatever you tinkered around with became part  
 3 of the prechorus.  
 4 I mean, correct me if I'm wrong, but at least  
 5 as to a song it's comprised of music and lyrics. We  
 6 know you didn't contribute any lyrics.  
 7 Did you contribute any music?  
 8 **MR. ANDERSON:** Objection as to form.  
 9 **THE WITNESS:** So I played some chords to which  
 10 he started with an idea that he developed, and it's a  
 11 process. It's a long process.  
 12 **Q.** BY MR. LOWE: Okay.  
 13 **A.** Making music is not like a recipe. It's not  
 14 like that.  
 15 **Q.** Okay. What's your percentage on the song?  
 16 **A.** Five percent, I believe.  
 17 **Q.** Okay.  
 18 **A.** Or less.  
 19 **Q.** All right.  
 20 **A.** I'm not exactly --  
 21 **Q.** I'm sorry?  
 22 **A.** My management handles that stuff. They have a  
 23 more accurate response.  
 24 **Q.** Well, we'll get to that in a second. Okay.  
 25 So can we say that your contribution to

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1 Starboy is some chords for the prechorus?  
 2 **A.** No, because the chords changed, eventually.  
 3 **Q.** Ah.  
 4 **A.** The chords is not bound to a specific thing.  
 5 **Q.** So here's what I'm hearing, and correct me if  
 6 I'm wrong.  
 7 I'm hearing that you were working on some  
 8 ideas for the prechorus on Starboy, but that your ideas  
 9 weren't actually ended being used, but that you still  
 10 got five percent because of the work that you did?  
 11 **A.** That's incorrect. I was not working towards  
 12 or geared towards Starboy, the song that we're currently  
 13 referring to.  
 14 **Q.** Oh, so you didn't do any work on Starboy, per  
 15 se?  
 16 **MR. ANDERSON:** Objection as to form.  
 17 **THE WITNESS:** That's also incorrect.  
 18 **Q.** BY MR. LOWE: Is that correct or incorrect?  
 19 **A.** Incorrect.  
 20 **Q.** Okay. Well, let me try again, then.  
 21 What, if anything, did you do with respect to  
 22 the song Starboy?  
 23 **A.** Like I have mentioned before, when you try to  
 24 compose an idea, a fresh concept from nothing, you take  
 25 different approaches. Sometimes it could be chords.

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1 Sometimes it could be rhythm. Sometimes it could be --  
 2 I don't know. It could be anything.  
 3 But in that specific moment where me and him,  
 4 with whatever became a part of, like, not because that  
 5 was the intention, but what became a part of, I was  
 6 playing some chords, and then afterwards something came  
 7 out of it, and then afterwards we made the version of a  
 8 song called "Ebony," and then afterwards, that was it.  
 9 And we did not go back to that song. And I am  
 10 not in a position to speak of Mr. Tesfaye's creative  
 11 process; therefore, I do not believe we fully know how  
 12 that became a part of Starboy. However, it did.  
 13 **Q.** So do you recognize anything that you did in  
 14 Starboy?  
 15 **A.** In comparison to the idea that we had started,  
 16 not as a -- you know, it was not -- it's in comparison.  
 17 **Q.** So --  
 18 **A.** It wasn't -- it's not --  
 19 **Q.** So in answer to my question whether you  
 20 recognize anything that you did in the final version of  
 21 Starboy that was released to the public, is it correct  
 22 that your answer is "no"?  
 23 **MR. ANDERSON:** Objection as to form.  
 24 **THE WITNESS:** I recognize from this idea that  
 25 we started, that it was similar, to a certain extent.



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1 That is how I acquired my five percent.  
 2 It's not as black and white as you are  
 3 currently making it out to be, but that is -- that's  
 4 what I recognize from a past idea that we had started.  
 5 **Q.** BY MR. LOWE: "A past idea."  
 6 So it was a musical idea?  
 7 **A.** Yes.  
 8 **Q.** Okay. So you recognize some of that musical  
 9 idea in the final version of Starboy?  
 10 **A.** It is not -- it is a musical idea by default,  
 11 because we are in -- we make music. With any other type  
 12 of domains, it would be labeled as such.  
 13 Currently, yes, in the musical form, but not  
 14 accurately from the idea from which it stemmed from  
 15 between me and him with regards to my involvement to  
 16 this song.  
 17 **Q.** All right. I'm sorry, Mr. Quenneville, I'm  
 18 having a hard time understanding what you're saying. So  
 19 let me try again.  
 20 When you listen to the final version of  
 21 Starboy that was released to the public, do you  
 22 recognize anything that you contributed in that version  
 23 at all in the prechorus anywhere?  
 24 **A.** Yes. In the prechorus, yes.  
 25 **Q.** And what do you recognize in the prechorus?

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1 Is it a chord progression? Is it a melody? Is it a  
 2 bass drum? What is it?  
 3 **A.** It's the lyrical reference.  
 4 **Q.** It's a "lyrical reference"?  
 5 **A.** Yes.  
 6 **Q.** Okay. And what lyrical reference is it?  
 7 **A.** "Table cut from Ebony" -- "twenty racks a  
 8 table cut from Ebony" part. I don't remember the lyrics  
 9 very well.  
 10 **Q.** Okay. So it's lyrics?  
 11 **A.** It is the lyrics that I recognize. Yes.  
 12 **Q.** And you recognize them, because that's what  
 13 you contributed for your five percent?  
 14 **A.** It is how I identify that I was a part of it.  
 15 **MR. ANDERSON:** I think he's asking if you  
 16 created those lyrics that you just phrased.  
 17 **THE WITNESS:** I did not. I did not. That is  
 18 how I recognize it.  
 19 **Q.** BY MR. LOWE: All right. So is it correct,  
 20 then -- and we'll move on, because I want to try to get  
 21 past this -- as Starboy is currently, the version that,  
 22 you know, was released to the public, originally  
 23 released to the public, there's actually nothing in  
 24 there that you actually performed or created; am I  
 25 right?

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1 **MR. ANDERSON:** Objection as to form.  
 2 **THE WITNESS:** Yes. Exactly correct.  
 3 **Q.** BY MR. LOWE: All right. Okay.  
 4 Now, were you in the studio when Mr. Tesfaye  
 5 was working on this song?  
 6 **A.** On the property at the studio, we bounce  
 7 around. There's multiple rooms in the studio where we  
 8 work.  
 9 **Q.** Okay. So you weren't actually in the room?  
 10 **A.** Not in the same room. I don't believe so.  
 11 No.  
 12 **Q.** Okay. And what studio is that?  
 13 **A.** Conway, I believe -- or, well, actually, you  
 14 know what, I was not in the room, so I don't know for a  
 15 fact.  
 16 **Q.** Okay.  
 17 **A.** I remember hearing it at Conway, you know.  
 18 **Q.** You remember hearing it at Conway Studio?  
 19 **A.** Yes.  
 20 **Q.** Okay. And Conway Studio, do you believe  
 21 that's located in Los Angeles?  
 22 **A.** Yes.  
 23 **Q.** Okay.  
 24 **A.** On Melrose.  
 25 **Q.** But do you know if it was first created at

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1 Conway Studio or not?  
 2 **MR. ANDERSON:** Objection as to form.  
 3 **THE WITNESS:** I do not know.  
 4 **Q.** BY MR. LOWE: Okay. Now, other than the time  
 5 that you heard it at Conway Studio in New York (sic),  
 6 did you ever have occasion to actually collaborate on  
 7 Starboy at any time after that?  
 8 **MR. ANDERSON:** I'm sorry. You referred to  
 9 "Conway Studio in New York."  
 10 **MR. LOWE:** I'm sorry.  
 11 **Q.** BY MR. LOWE: Conway Studio in Los Angeles.  
 12 **MR. ANDERSON:** Could you please repeat the  
 13 question?  
 14 **MR. LOWE:** Yes. I absolutely will.  
 15 **Q.** BY MR. LOWE: After the time that you heard  
 16 the song Starboy at Conway Studio in Los Angeles, was  
 17 there any subsequent occasion, that you recall, where  
 18 you worked on the song with Mr. Tesfaye?  
 19 **A.** I do not recall.  
 20 **Q.** Okay. All right. Now, I want you to turn to  
 21 Exhibit No. 18.  
 22 (Plaintiff's Exhibit No. 18 was marked  
 23 for identification and is attached hereto.)  
 24 **MR. LOWE:** And you can go ahead and mark it  
 25 after he identifies it?

<p style="text-align: right;">Page 30</p> <p>1 THE COURT REPORTER: (Nodding head.)</p> <p>2 Q. BY MR. LOWE: Let me know when you have it in</p> <p>3 front of you.</p> <p>4 A. I have it in front of me.</p> <p>5 Q. Okay. This is an agreement that you entered</p> <p>6 into with respect to, among other songs, Starboy,</p> <p>7 correct?</p> <p>8 A. It would appear so.</p> <p>9 Q. All right. And is that your signature on the</p> <p>10 next to last page of the agreement?</p> <p>11 A. That is my signature there.</p> <p>12 Q. Okay. And where were you when you signed it?</p> <p>13 A. I cannot recollect.</p> <p>14 Q. Okay.</p> <p>15 A. I can't remember the office.</p> <p>16 Q. All right. And do you believe that signature</p> <p>17 right above your signature is Mr. Tesfaye's signature?</p> <p>18 A. There's no is signature above mine.</p> <p>19 Q. Well, next to yours.</p> <p>20 A. There's one to the right.</p> <p>21 Q. To the right. Correct.</p> <p>22 A. Well, there's a signature, but I wouldn't know</p> <p>23 if it is his or not. I don't really know his signature.</p> <p>24 Q. Well, did he sign this in front of you?</p> <p>25 A. I think it was signed separate, with a</p>	<p style="text-align: right;">Page 32</p> <p>1 on Starboy, correct?</p> <p>2 A. On the final page, it does say, "5 percent."</p> <p>3 Q. Right.</p> <p>4 And that's accurate, as far as you know,</p> <p>5 right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Have you derived any money from the</p> <p>8 sales or other exploitations of Starboy yet?</p> <p>9 MR. ANDERSON: Objection. Outside the scope</p> <p>10 of jurisdiction of discovery.</p> <p>11 MR. LOWE: Well, I'm coming around to that.</p> <p>12 You're not instructing him not to answer,</p> <p>13 right?</p> <p>14 MR. ANDERSON: I'm not. I mean, I'll give you</p> <p>15 some leeway, but I don't see it's relevant through</p> <p>16 jurisdictional discovery.</p> <p>17 But it's asking for a "yes" or "no" answer.</p> <p>18 Q. BY MR. LOWE: Yes.</p> <p>19 A. My business management would have a better</p> <p>20 answer to -- I do not know for sure.</p> <p>21 Q. All right.</p> <p>22 A. This is 2016. I don't know.</p> <p>23 Q. So you've never seen a statement where you saw</p> <p>24 that you got some money from Starboy?</p> <p>25 A. My business management would know that.</p>
<p style="text-align: right;">Page 31</p> <p>1 witness, I believe.</p> <p>2 Q. Okay.</p> <p>3 A. I cannot recollect. My management would know</p> <p>4 better.</p> <p>5 Q. All right. Now, if you look up at</p> <p>6 paragraph 8, in all capital letters, it says, "This</p> <p>7 agreement shall be governed by and construed under the</p> <p>8 laws and judicial decisions of the State of New York</p> <p>9 without giving effect to the conflict of laws principles</p> <p>10 of New York."</p> <p>11 Do you see that?</p> <p>12 A. I do.</p> <p>13 Q. All right. Do you know why that you and</p> <p>14 Mr. Tesfaye agreed to be governed by the laws and</p> <p>15 judicial decisions of the State of New York?</p> <p>16 MR. ANDERSON: Objection as to form.</p> <p>17 Go ahead.</p> <p>18 THE WITNESS: I do not.</p> <p>19 Q. BY MR. LOWE: Okay. Do you recall if there</p> <p>20 was any discussion as to why you were going to be</p> <p>21 governed by the laws of New York?</p> <p>22 A. I do not.</p> <p>23 Q. Okay. All right.</p> <p>24 Now, and this, by the way, the exhibit,</p> <p>25 confirms the fact that you are a five percent co-writer</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. But I'm asking you, have you seen that?</p> <p>2 A. I understand. But not to the best of my</p> <p>3 recollection. No.</p> <p>4 Q. All right. Do you know if you have derived</p> <p>5 any revenue from sales or exploitations of Starboy in</p> <p>6 New York?</p> <p>7 A. I do not.</p> <p>8 Q. All right. Other than the instances that you</p> <p>9 have identified of the approximately ten times or quite</p> <p>10 a few times that you've been with Mr. Tesfaye in</p> <p>11 New York, do you have any other contacts with New York?</p> <p>12 Have you been to New York yourself before?</p> <p>13 MR. ANDERSON: Objection as to form.</p> <p>14 Go ahead.</p> <p>15 THE WITNESS: Been to New York. Yes. I have.</p> <p>16 Q. BY MR. LOWE: All right. Approximately how</p> <p>17 many times have you been to New York in the last five</p> <p>18 years?</p> <p>19 A. I have no idea.</p> <p>20 Q. Well, I'm entitled to your best estimate.</p> <p>21 A. I know you are. I still don't have no idea.</p> <p>22 Q. Well, is it --</p> <p>23 A. I just go along with it. I'm not here to keep</p> <p>24 track of how many trips I take.</p> <p>25 Q. Well, I understand. You know, I understand</p>

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1 that you have not kept some sort of diary of each of  
 2 your trips to New York in the last five years. But I am  
 3 entitled to your best estimate.  
 4 And so can you tell me approximately how many  
 5 times that you've been in New York in the last five  
 6 years?  
 7 MR. ANDERSON: Can I ask for a classification?  
 8 You're asking him, setting aside instances where he went  
 9 to New York and Mr. Tesfaye was there, how many times he  
 10 recalls going to New York without Mr. Tesfaye?  
 11 MR. LOWE: That's correct.  
 12 MR. ANDERSON: Is that right?  
 13 MR. LOWE: Yes.  
 14 MR. ANDERSON: Thank you.  
 15 THE WITNESS: Three times.  
 16 Q. BY MR. LOWE: Okay. And what were the purpose  
 17 of those three times?  
 18 A. To see a friend of mine.  
 19 Q. So the other three times were not business  
 20 related? It had nothing to do with music?  
 21 A. Correct.  
 22 Q. Did you ever go to the offices of Republic  
 23 Records located at -- one second. I'll tell you the  
 24 address.  
 25 A. No. I have not.

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1 Q. Okay. So you've never been to Republic at  
 2 1755 Broadway?  
 3 A. No. I have not.  
 4 Q. All right. Are you currently signed -- well,  
 5 strike that.  
 6 You mentioned your "management." Who is your  
 7 management?  
 8 A. (Unintelligible.)  
 9 Q. I'm sorry. Could you say that again?  
 10 A. Sal & Co.  
 11 MR. ANDERSON: I'm sorry. I just want to  
 12 object as to form. I know I'm late, but I think you  
 13 have to be more specific.  
 14 Go ahead.  
 15 Q. BY MR. LOWE: Well, this is your management  
 16 company in the entertainment industry, correct?  
 17 MR. ANDERSON: Objection as to form.  
 18 But I'm happy to tell you what my concern is,  
 19 Mr. Lowe, but go ahead.  
 20 MR. LOWE: Go ahead and tell me what your  
 21 concern is.  
 22 MR. ANDERSON: People in this business have  
 23 personal managers and business managers, and you're not  
 24 distinguishing between the two.  
 25 MR. LOWE: Okay. Sorry.

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1 Q. BY MR. LOWE: I'm referring to your personal  
 2 managers.  
 3 A. Okay. What about them? What's the question?  
 4 Q. Who are they?  
 5 A. I am in business, personal business, but not  
 6 business, personal management deal with Sal & Co.  
 7 Q. Can you spell it, please?  
 8 A. S-A-L, the character for "and," C-O.  
 9 Q. Sal & Co.?  
 10 A. Yes.  
 11 Q. Where is Sal & Co. located?  
 12 A. I would not know.  
 13 Q. Have you ever met with anybody of your  
 14 personal managers in person?  
 15 A. Yes.  
 16 Q. Where did you meet with them?  
 17 A. In Los Angeles, but it stems from Canada to  
 18 begin with.  
 19 Q. Okay.  
 20 A. Specifically, in Ottawa.  
 21 Q. Oh, okay. All right. Let's see. Question  
 22 for you.  
 23 Were you aware that Mr. Tesfaye's entered into  
 24 a settlement agreement with Squad Music concerning the  
 25 song Starboy?

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1 MR. ANDERSON: Objection. Again, outside the  
 2 scope of jurisdictional discovery.  
 3 It's a "yes" or "no" question.  
 4 THE WITNESS: No.  
 5 Q. BY MR. LOWE: All right. Have we now  
 6 identified all contacts that you've had with New York  
 7 over the last five years, or are there any others that  
 8 you have not testified to?  
 9 MR. ANDERSON: Objection as to form.  
 10 THE WITNESS: Yes. We have pretty much laid  
 11 out most of what I can remember, to the best of my  
 12 recollection.  
 13 Q. BY MR. LOWE: Okay. Is there anything else  
 14 that you remember?  
 15 A. No.  
 16 Q. All right. Do you know why you were not  
 17 originally on the split agreement concerning Starboy?  
 18 A. I do not.  
 19 Q. All right. Was there any discussions or  
 20 negotiations that you recall having with Mr. Tesfaye or  
 21 others about getting your five percent?  
 22 A. No.  
 23 Q. Okay.  
 24 A. Not with Mr. Tesfaye.  
 25 THE COURT REPORTER: I didn't hear him.

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1 MR. LOWE: I think he said, "not with  
2 Mr. Tesfaye."  
3 Q. BY MR. LOWE: Is that what you said?  
4 A. Yes. Correct.  
5 Q. Did you have discussions with anybody else?  
6 A. My management, Sal & Co.  
7 Q. Okay. Anybody else that you recall?  
8 A. Nobody else.  
9 Q. All right.  
10 A. Not that I recall.  
11 MR. LOWE: Let's take a five-minute break, but  
12 I may be done with you. So let me just make sure that I  
13 haven't forgotten to ask you anything.  
14 I guess, Peter, do you think it's okay if I  
15 put it on hold? You guys are going to get music, or I  
16 could just leave the line open. But let's go ahead and  
17 take a five-minute break.  
18 Is that okay with everybody?  
19 MR. ANDERSON: Yeah. That's fine. We'll just  
20 wait for you to come back.  
21 MR. LOWE: Okay. All right.  
22 (Brief recess was taken from 6:45 p.m. to  
23 6:46 p.m.)  
24 MR. LOWE: All right. Well, I don't have  
25 anything else.

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1 Anybody else have any questions for  
2 Mr. Quenneville? Okay. Are you guys there still?  
3 THE WITNESS: Yep.  
4 MR. ANDERSON: Yes. We're waiting for Alex.  
5 MR. LOWE: I was waiting for Alex, too.  
6 MR. SILAGI: Still here. No questions.  
7 MR. LOWE: Okay. All right.  
8 Well, with that in mind, I guess let's enter  
9 into a stipulation, that the court reporter can be  
10 relieved of her duties under the code.  
11 We're going to expedite this transcript to get  
12 it, actually, on Friday, given the sort of tight time  
13 frame that we're on.  
14 So, you know, if possible, can we have him  
15 review and make any corrections to the transcript --  
16 It's going to be short, right? It's only  
17 going to be, how many pages do you think, Court  
18 Reporter?  
19 THE COURT REPORTER: About 40.  
20 MR. LOWE: It's going to be about 40 pages.  
21 So do you think we can get him to review it  
22 and make any changes by a week from Friday?  
23 MR. ANDERSON: Which Friday, though? Are you  
24 talking about two days from now?  
25 MR. LOWE: Well, we're --

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1 MR. ANDERSON: Or next Friday?  
2 MR. LOWE: The transcript will be circulated  
3 by e-mail, probably just by e-mail, for the most part,  
4 this Friday, the 30th, and then what I'm asking him is  
5 if he could read it and make any changes by the  
6 following Friday.  
7 MR. ANDERSON: We will try that. I mean,  
8 they're leaving Hong Kong and moving on to the next  
9 venue, and so it may be difficult. But I will endeavor  
10 to get that done for you.  
11 MR. LOWE: Okay. And the original transcript  
12 will be maintained by you, Peter, and that will be  
13 signed by the deponent. And a certified copy can be  
14 used in lieu of the original for all purposes.  
15 MR. ANDERSON: So stipulated.  
16 MR. LOWE: Okay. So stipulated.  
17 (The deposition was concluded at 6:48 p.m.)  
18 -OOO-

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1 DEPONENT'S DECLARATION  
2  
3 I, JASON QUENNEVILLE, hereby declare:  
4 I have read the foregoing deposition  
5 transcript, I identify it as my own, and I have made any  
6 corrections, additions, or deletions that I was desirous  
7 of making in order to render the within transcript true  
8 and correct.  
9 I declare under penalty of perjury, under  
10 the laws of the State of California, that the foregoing  
11 is true and correct.  
12  
13 \_\_\_\_\_  
14 (Date) (City and State)  
15  
16 \_\_\_\_\_  
17 (Signature)  
18  
19  
20  
21  
22  
23  
24  
25

1 STATE OF CALIFORNIA )  
2 ) ss.  
3 COUNTY OF LOS ANGELES )

4 I, Tisha C. Okuma, Certified Shorthand  
5 Reporter, Certificate No. 9774 in the State of  
6 California, duly empowered to administer oaths, do  
7 hereby certify:

8 I am the deposition officer that  
9 stenographically recorded the testimony in the foregoing  
10 deposition;

11 Prior to being examined, the deponent was by  
12 me first duly sworn;

13 The foregoing transcript is a true record of  
14 the testimony given;

15 I was relieved of my duty pursuant to Code  
16 of Civil Procedure, Section 2025 (Q)(1), and therefore  
17 any changes made by the deponent or whether or not the  
18 deponent signed the transcript are not set forth.

19  
20 Dated \_\_\_\_\_, Los Angeles, California.

21  
22  
23 \_\_\_\_\_  
24  
25